

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,

-v-

NOTICE OF MOTION

SAMUEL ASHKENAZI, et al.,

No. 12 Cr. 581 (PKC)

Defendants,

SAMUEL GOLDBERGER,

Defendant-Movant.

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PLEASE TAKE NOTICE, that upon the Memorandum of Law and accompanying Exhibits and Declaration submitted in support, Defendant Samuel Goldberger hereby moves this Court for the modification of his bail conditions to (1) remove the conditions of home confinement with electronic monitoring, (2) increase the amount of the personal recognizance bond to \$1,500,000 secured by \$1,000,000 in cash and property, including one property not owned by Mr. Goldberger or his wife, and (3) require five financially responsible persons as co-signors on the personal recognizance bond.

Dated: September 20, 2012

Respectfully submitted,

HAFETZ NECHELES & ROCCO



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